

To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]; Grundler, Christopher[grundler.christopher@epa.gov]
From: Michael.McAdams@hklaw.com
Sent: Fri 11/21/2014 12:37:59 AM
Subject: Fw: Rfs rumor

Here is the latest.

Sent using BlackBerry

----- Original Message -----

From: Rachel Gantz [mailto:rgantz@opisnet.com]
Sent: Thursday, November 20, 2014 04:46 PM Eastern Standard Time
To: McAdams, Michael J (WAS - X75140)
Subject: Rfs rumor

That tomorrow is the today and they'll make 2014 a guidance year
Sent from my iPhone

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To: Grundler, Christopher[grundler.christopher@epa.gov]
Cc: behanwilliamm@johndeere.com[behanwilliamm@johndeere.com]
From: cfdcinc@aol.com
Sent: Wed 7/30/2014 10:04:57 PM
Subject: Re: Letter for your consideration

Chris-- again, thanks for your prompt response. Specifically, Bill Behan of John Deere ,which is a member company of ours, was there and he was one of the people that mentioned this to me. Bill is a very good guy and neither he nor or I, or any of our members, are trying to stir things up. This did not go to the press or any of the ethanol groups, or anyone else. However, that was the impression he and some others got and we truly want to understand the thinking on this issue.

So sure, we would love to have a chance to follow up with you. How could we do that in a way that is convenient for you? While we could do it by phone with a simple conference call with you, Bill and me, I would always welcome an opportunity to visit in person and talk about the RFS.

So again, thanks and let me know how you would like to proceed.

Doug Durante

-----Original Message-----

From: Grundler, Christopher <grundler.christopher@epa.gov>
To: cfdcinc <cfdcinc@aol.com>
Sent: Mon, Jul 28, 2014 11:46 pm
Subject: Re: Letter for your consideration

Doug:

My comments were in response to a question about whether EPA should engage in more consumer education about the potential for misfueling with E15, and join OPEI's campaign. I responded that given the very few stations currently selling E15, this is not a priority for us beyond what we are already doing. In my broader remarks, I tried to explain to the audience our reasoning behind our proposed standards for 2014, our commitment to implement the RFS in a way that continues the growth of biofuels while also recognizing current marketplace and other constraints, the large number of public comments, and the current status of deliberations.

Please let me know which member companies/individuals were in attendance so that I can follow up with them directly and clear up any misunderstandings. I am disappointed these folks who reported to you about my remarks did not introduce themselves to me afterwards so I could have addressed these concerns right away.

Thanks

Chris

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)

www.epa.gov/otaq

cfdcinc@aol.com



Please see attached letter regarding some questions on the RFS.

Thank you.

To: Grundler, Christopher[grundler.christopher@epa.gov]
From: cfdcinc@aol.com
Sent: Mon 7/28/2014 2:23:37 PM
Subject: Re: Letter for your consideration

thanks-- that's why I asked.

-----Original Message-----

From: Grundler, Christopher <grundler.christopher@epa.gov>
To: cfdcinc <cfdcinc@aol.com>
Sent: Mon, Jul 28, 2014 10:11 am
Subject: Re: Letter for your consideration

This is NOT an accurate report of my remarks
Full response to follow

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq

cfdcinc@aol.com



Please see attached letter regarding some questions on the RFS.

Thank you.

To: Grundler, Christopher[grundler.christopher@epa.gov]
From: cfdcinc@aol.com
Sent: Mon 7/28/2014 1:58:00 PM
Subject: Letter for your consideration
[EPAGrundler0714f.docx](#)

Please see attached letter regarding some questions on the RFS.

Thank you.

July 22, 2014

Mr. Christopher Grundler
Director, Office of Transportation and
Air Quality
US Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Grundler:

Greetings! Let me begin by saying we value the longstanding working relationship we have had with EPA and your office specifically. We appreciate the recent briefing provided us on the EPA Act Study and the dialogue we have been able to have with your staff.

I am writing today, however, with regard to the signals we are getting from EPA as it impacts the long term implementation of the RFS. Several of our member companies were in attendance at a recent meeting of the Outdoor Power Equipment Manufacturers where you were reported to have indicated EPA sees little expansion in ethanol use. Specifically, in the course of discussing the issue of consumer education and the necessity of programs to guard against fueling small engines with E15, you were said to have dismissed the need for any such program on the basis that you anticipated 90% or more of all ethanol to be in 10% blends.

If that is an accurate report, that would mean that you see no growth for ethanol in general since almost all gasoline currently contains 10% ethanol. Under a no growth scenario, the RFS is of course impossible to meet, and that signal is received loud and clear by the investment community. In turn our member companies and organizations who are involved in ethanol production, technology development, process design and engineering, construction, agriculture, equipment manufacturing, and even automakers would understandably find this troubling.

I am fully aware that there are numerous fuels and pathways to meet the RFS but I think it is clear that without a substantial base of ethanol, from both corn and cellulose, these other fuels are limited in terms of what we can expect from a volume contribution. E15 is an approved fuel that, with each passing year, can be used in more and more automobiles. Marketers and retailers tell us the only real restriction to increased E15 use is the limitation of the RVP waiver to blends higher than 10%. This restriction has no technical justification. In fact, 15% ethanol blends are likely to further reduce evaporative emissions. If EPA is truly supportive of the RFS and wants to help facilitate a market for the next generation of biofuels we would hope EPA would support a one pound waiver for all ethanol blends and propose a rule to that effect. Our data not only shows a vapor pressure decrease in most cases as ethanol volumes increase but it also indicates significant dilution value for sulfur and aromatics. In short, higher ethanol volumes when splash blended on finished E10 would seem to have a dramatic effect on fuel quality and the resulting emissions.

Similarly, higher blends in Flex Fuel Vehicles (FFVs) would not seem to have any role in the future under your flat line assumption. This is, in our view, attributable to the simple fact that automakers are not likely to produce more FFVs. The adoption of a higher utility factor and a better recognition of the field to wheels value of ethanol—including the mounting evidence of corn's carbon sequestration value—would change that. Mid-level blends ranging from E30 to E85 would then offer substantial CO2 reductions consistent with the Administration's Climate Change goals while addressing the gasoline derived UFP problem that currently is not captured in the PM10 or PM 2.5 regulations.

Knowing that these two direct and simple actions of extending the RVP waiver and improving the value of FFV credits would instantly make meeting the RFS feasible while resolving the E10 blend wall issue, we are troubled by reports that you see no growth. If taken at face value does this mean that EPA is not pursuing these solutions?

For our members who are developing cellulosic ethanol, does this mean you see no development in this space since there is almost none in the market today? And if you did see cellulosic ethanol coming on line, where would it find a market given the roadblocks to both E15 and mid to higher blends in FFVs? How could we see development in cellulosic ethanol and still have only a 10% market penetration?

We are having difficulty reconciling this position with statements from the Administrator and others that EPA remains committed to and supportive of biofuels and the RFS.

Making the RFS work is a challenge for all of us. We believe with proactive steps the RFS goals can be realized but I hope you can now see our concerns regarding perceptions about your comments. I will be grateful for any clarification you can provide so I can respond to our members who were at the OPEM meeting. From a public perception perspective it is important to hear how EPA intends to support increased biofuels utilization.

Sincerely,



Douglas A. Durante
Executive Director

Cc: Todd Sneller, Chairman

641 Montgomery Avenue, Suite 350, Bethesda, MD 20814
301-718-0077 • 301-718-0606/Fax • www.cleanfuelsdc.org

To: David Marchick[David.Marchick@carlyle.com]
Cc: John McShane[john.mcshane@pes-companies.com]
From: Grundler, Christopher
Sent: Fri 5/29/2015 6:41:14 PM
Subject: Re: EPA RFS Proposal

Ultimately the market will decide how to achieve the proposed volumes, and those choices will determine if ethanol volumes go above the blendwall, and by how much (as you know, we do not establish an ethanol standard). Happy to discuss between press calls...

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. EPA
202-564-1682 (DC)
734-214-4207 (Ann Arbor)

On May 29, 2015, at 1:58 PM, David Marchick <David.Marchick@carlyle.com> wrote:

Thanks Chris for the outreach. I am adding John McShane, PES's GC, who is point on the issue. I think our main area of focus is the 2016 number and whether it is above or below the blend wall. We have receive differing reports.

Dave

From: Grundler, Christopher [<mailto:grundler.christopher@epa.gov>]
Sent: Friday, May 29, 2015 1:57 PM
To: David Marchick
Subject: EPA RFS Proposal

David—

I got your contact information from Dan Utech. I am available to answer any questions you may have regarding today's proposal. Please feel free to give me a call at 202.564.1682

Chris Grundler, Director
Office of Transportation and Air Quality

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To: David.marchick@carlyle.com[David.marchick@carlyle.com]
From: Grundler, Christopher
Sent: Fri 5/29/2015 5:56:38 PM
Subject: EPA RFS Proposal

David—

I got your contact information from Dan Utech. I am available to answer any questions you may have regarding today's proposal. Please feel free to give me a call at 202.564.1682

Chris Grundler, Director

Office of Transportation and Air Quality

To: Margo Oge[margo.oge@icloud.com]
From: Grundler, Christopher
Sent: Fri 5/29/2015 5:23:34 PM
Subject: Re: Quick call?

Today is RFS rollout day. Busy with press. Will try you from airport this evening

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. EPA
202-564-1682 (DC)
734-214-4207 (Ann Arbor)

> On May 29, 2015, at 10:37 AM, Margo Oge <margo.oge@icloud.com> wrote:
>
>
>
> Sent from my iPhone

To: Sarkar, Reuben[Reuben.Sarkar@EE.Doe.Gov]
From: Grundler, Christopher
Sent: Mon 5/18/2015 3:14:22 AM
Subject: Re: Requesting your participation in a DOE-hosted Listening Day: Optima, Co-Optimization of Fuels and Engines [16 – 17 June, 2015]

Thanks Reuben, for including us in this session. And thanks again for taking the time to come speak at our advisory committee meeting.

I will get back to you about our participation in the workshop at NREL. With the RFS proposal coming out at the beginning of June, along with the Truck Ghg proposal, plus a proposal on aircraft around the same time, this summer will be extremely hectic.

Chris

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. EPA
202-564-1682 (DC)
734-214-4207 (Ann Arbor)

On May 15, 2015, at 1:37 PM, Sarkar, Reuben <Reuben.Sarkar@EE.Doe.Gov> wrote:

Dear Chris:

I would like to personally invite you to participate in a stakeholder Listening Day to be held June 16 – 17, 2015 at the National Renewable Energy Laboratory, Golden, Colorado.

This workshop will help me set the strategy for a significant new DOE undertaking. Optima is an ambitious multi-lab, multi-year initiative aimed at accelerating into the marketplace advanced fuels and engines that are environmentally responsible, economically viable, and commercially scalable. Our approach will be a concerted, coordinated effort to help provide the technical foundation for fuel and engine concepts resulting in dramatic reductions in GHG emissions and petroleum use in the U.S.

At this first Optima Listening Day you will be asked to influence the design and execution

of the initiative according to your interests as a key stakeholder in the fuels/engines community. This Listening Day will be a productive forum for a broad crosscut of stakeholders to share their perspectives, review goals and strategies, and help ensure that the initiative includes the research and development activities most needed to meet our ambitious goals at an accelerated pace. Please review the attachment for a brief current overview of Optima. Registration details and contact information can be found at: <http://energy.gov/eere/bioenergy/optima-stakeholder-listening-day>.

Your personal participation will help create a highly productive and rewarding workshop. I hope you can join us. If you cannot attend, please identify an alternate to represent your organization at this invitation-only event. I look forward to meeting with you and sharing ideas on how best to move Optima forward.

Regards,

Reuben Sarkar

Deputy Assistant Secretary for Transportation

To: Margo Oge[margo.oge@icloud.com]; Margo Oge[margo.oge@gmail.com]
From: Grundler, Christopher
Sent: Wed 4/22/2015 12:37:27 AM
Subject: A few more thoughts on tomorrow

Our staff would love to hear about:

****Your life after OTAQ, and how you are continuing to serve**

****Your impressions of the new lab and the cool work happening that you saw on the tour**

****Your observations of our work from afar :**

- tier 3
- defending the ECA
- high profile fuel economy work (Hyundai -Kia, Ford, BMW, Mercedes relabeling)
- seeing more and more SmartWay trucks on the road
- you still reading the same arguments about the RFS (some things will never change), but don't give up!

****Your perspectives on the future challenges and opportunities for the transportation sector**

As background and context, I have established the following strategic priorities for the office (feel free to endorse!)

1. Keeping Our Promises for Cleaner Air (delivering the promised benefits of our standards through a greater emphasis on our certification and compliance work)
2. Building on our climate work (mid term evaluation; HD Phase 2; long term futures work)
3. Developing a Long Term Fuels Strategy for the U.S.
4. Bringing a place-based emphasis to our work, with a focus on Ports
5. Investing in Science and Data (preparing for the future)

See you in the morning

C--

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. EPA
202-564-1682 (DC)
734-214-4207 (Ann Arbor)

To: Rachel Gantz[rgantz@opisnet.com]
From: Grundler, Christopher
Sent: Sun 1/25/2015 2:37:29 PM
Subject: Re: Pre-arranging interview during RFA conference?

Hi Rachel,
I'd be happy to talk with you. I'm not sure of my exact schedule yet. As soon as I am I will let you know.

Chris

Sent from my iPhone

On Jan 23, 2015, at 9:20 AM, Rachel Gantz <rgantz@opisnet.com> wrote:

Mr. Grundler,

I see you are speaking at RFA's ethanol conference next month. I am sure your schedule will be busy while there, but I would like to pre-arrange a quick interview with you at the conference, to talk about the RFS, etc. Please let me know your availability at the conference and hopefully we can schedule some time to talk.

Thanks in advance.

Rachel Gantz

Senior Editor, Renewable Fuels

OPIS

Two Washingtonian Center

9737 Washington Blvd, Suite 200

Gaithersburg, Md. 20878-7364

(301) 287-2629

rgantz@opisnet.com

Twitter: OPISBiofuels

To: Jacques Beaudry-Losique[Jacques.Beaudry-Losique@algenol.com]
Cc: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]; Simon, Karl[Simon.Karl@epa.gov]
From: Grundler, Christopher
Sent: Tue 1/13/2015 5:15:55 PM
Subject: Re: Algenol press release mentioning EPA

Thanks for sharing this Jacques, along with your kind words.

Happy 2015

Sent from my iPhone

On Jan 13, 2015, at 11:00 AM, Jacques Beaudry-Losique <Jacques.Beaudry-Losique@algenol.com> wrote:

Chris, team:

Here is a little heads-up about Algenol announcing our pathway approval. This will be out at 11 am today. We tried to reflect what was communicated to us in the EPA Determination letter. We will be very explicit in public and in meetings that we still need to go through the part 79 and part 80 process, but the pathway was a big milestone.

Many thanks for your prompt and diligent work! To be fair, we are perfectly happy with the pathway process. I am sure the industry would have no issue if they had the same experience we've had.

Jacques

<[EPA Approves Algenol Fuels for RFS.pdf](#)>

To: Mary Giglio[MGiglio@ethanolrfa.org]
From: Grundler, Christopher
Sent: Tue 1/13/2015 3:38:08 PM
Subject: RE: Invitation to speak at the National Ethanol Conference

Good Morning Mary. A quick note to confirm my participation in your conference. Pls send me any logistical information I might need, as well as information on the panel

Chris

From: Mary Giglio [mailto:MGiglio@ethanolrfa.org]
Sent: Friday, January 09, 2015 9:27 AM
To: Grundler, Christopher
Subject: RE: Invitation to speak at the National Ethanol Conference

Thanks, Chris! Hope you can make it.

Mary

From: Grundler, Christopher [mailto:grundler.christopher@epa.gov]
Sent: Thursday, January 08, 2015 2:28 PM
To: Mary Giglio
Cc: EthanolRFA
Subject: RE: Invitation to speak at the National Ethanol Conference

Hi Mary—

Happy 2015! Im very sorry for the delay in responding. Thanks for the invitation again this year. I am interested in attending, but need to work out a couple of pending requests for that same time period. I hope to have an answer for you by week's end or early next.

Chris

From: Mary Giglio [mailto:MGiglio@ethanolrfa.org]

Sent: Monday, December 01, 2014 10:35 AM
To: Grundler, Christopher
Cc: EthanolRFA
Subject: Invitation to speak at the National Ethanol Conference

Dear Chris,

On behalf of the Renewable Fuels Association (RFA), I would like to invite you to participate as a speaker in the **RFA's 20th Annual National Ethanol Conference: Going Global**, which will be held February 18-20, 2015 at the Gaylord Texan Resort & Convention Center in Grapevine, Texas.

The National Ethanol Conference is recognized as the premier forum for industry interaction, networking and education on marketing and policy issues affecting the ethanol industry. We anticipate an audience of more than 1,200 including ethanol and petroleum executives; fuel marketers and blenders; transportation officials; public policy makers; environment and energy officials; agricultural leaders; industry suppliers; academic and research institutions; and consumer and environmental advocates.

We would welcome your participation in a plenary session panel on the opening day focused on the RFS and California LCFS, which is scheduled for Thursday, February 19th at 11:00 a.m. Specifically, we would be interested in hearing from EPA about the Agency's progress in implementing RFS volume requirements for 2014-2016, key implementation challenges moving forward, and opportunities to work together to ensure the continued success of the program. Other panelists will include a representative from the environmental NGO community, California Air Resources Board, and the oil industry.

For more information about the conference, please visit our conference web site at www.nationalethanolconference.com.

We hope that you will consider participating, and I look forward to discussing this opportunity with you further.

Best,

Bob Dinneen

Sent by

Mary Giglio

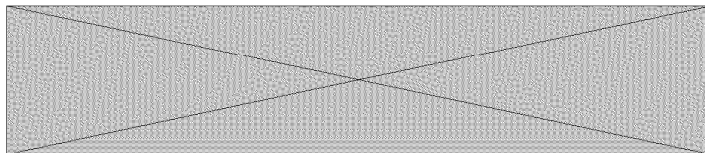
Director, Projects and Special Events

Renewable Fuels Association

(202) 315-2466

mgiglio@ethanolRFA.org

www.ethanolRFA.org



To: sromeo@calstart.org[sromeo@calstart.org]
From: Grundler, Christopher
Sent: Thur 12/18/2014 3:19:39 AM
Subject: Re: CALSTART Annual Meeting and Awards Luncheon - slide show

Thanks for letting us review before you posted. The original text would have got me in hot water. Here is what I said (or meant to say)....

"The car auto industry as a whole is beating their targets. We are very pleased with the progress to date toward the 2025 standards. The mid-term review only affects model years 2022 through 2025, and there are three possible outcomes of our review: the standards could stay the same, they could become more stringent, or they could become less stringent".

"We would all benefit from a longer-term fuel policy....we plan to address the 2014 renewable fuel standard, along with 2015 and 2016, as soon as we can in the coming year".

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq



You're bad... ☺ Take care. sue

From: Grundler, Christopher [mailto:grundler.christopher@epa.gov]
Sent: Wednesday, December 17, 2014 5:19 PM
To: Susan Romeo
Subject: Re: CALSTART Annual Meeting and Awards Luncheon - slide show

Well, he was drinking..... (kidding)

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq

From: Susan Romeo

Sent: Wednesday, December 17, 2014 8:12 PM

To: Grundler, Christopher

Subject: RE: CALSTART Annual Meeting and Awards Luncheon - slide show

Oh please do. John gave them to me and since he was there while I was running around like a banshee, I took them as reality. Thx sue

From: Grundler, Christopher [<mailto:grundler.christopher@epa.gov>]

Sent: Wednesday, December 17, 2014 5:08 PM

To: Susan Romeo

Subject: Re: CALSTART Annual Meeting and Awards Luncheon - slide show

Susan, I need to correct those quotes. Will send later this evening

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq

From: Susan Romeo

Sent: Wednesday, December 17, 2014 7:35 PM

To: sromeo@calstart.org

Subject: CALSTART Annual Meeting and Awards Luncheon - slide show

Hello Everyone!

I wanted to send this little slide show on the CALSTART Annual Meeting and Blue Sky Awards Luncheon I put together and will be posting on the web soon. I hope you enjoy it as much as I did putting it together.

I also plan to send awardees individual pictures so you can have them for your personal scrapbooks (oh wow!). Give me a couple of more days.....

In the meantime, Happy Holidays and the best in 2015. Thank you for your continued support of CALSTART! You'll be hearing from me next year.....

Regards,

Susan

Susan Romeo

Director, Clean Transportation Services

CALSTART

48 S Chester Ave

Pasadena, CA 91106

626/744-5686

CALSTART Annual Meeting and Blue Sky Award Luncheon- A New Era for Clean Transportation: Pathways for Clean Technologies

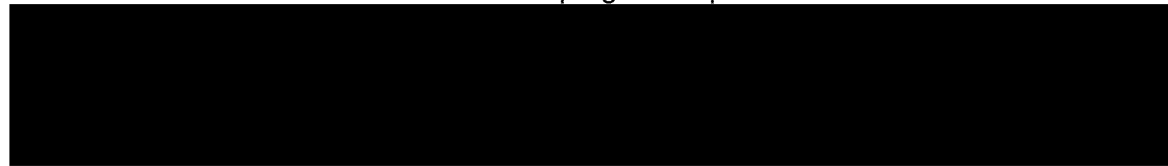
Tuesday, December 9| Los Angeles, CA| Register today at www.blueskyaward.org

To: Shepardson, David[DShepardson@detroitnews.com]
From: Grundler, Christopher
Sent: Sat 11/22/2014 3:31:21 AM
Subject: Re: saw your boss this week at christian science monitor breakfast

In DC still. Rough day on RFS today....sigh. Drive home tomorrow and will catch game on the net I hope.

Keep me posted on the future of NHTSA

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq



hope you are well!

have a nice holiday. You going to Michigan game tomorrow?

David Shepardson
Detroit News Washington Bureau Chief
529 14th Street NW Suite 969
Washington, DC 20045
(202) 662-8735 (phone)
(202) 365-8210 (mobile)
twitter.com/davidshepardson

To: Richard Moskowitz[RMoskowitz@afpm.org]
From: Grundler, Christopher
Sent: Fri 11/21/2014 3:48:08 PM
Subject: RE: Notice of Intent to Sue (2014 RFS)

Thank you

From: Richard Moskowitz [mailto:RMoskowitz@afpm.org]
Sent: Friday, November 21, 2014 10:41 AM
To: Grundler, Christopher
Subject: FW: Notice of Intent to Sue (2014 RFS)

From: Richard Moskowitz
Sent: Friday, November 21, 2014 10:23 AM
To: 'mccarthy.gina@epa.gov'
Cc: Charlie Drevna; 'garbow.avi@epa.gov'; 'grundler.chris@epa.gov'
Subject: Notice of Intent to Sue (2014 RFS)

Administrator McCarthy,

Attached please find the American Fuel & Petrochemical Manufacturers' notice of intent to sue EPA to enforce EPA's non-discretionary duty to promulgate Renewable Fuel Standard regulations for 2014.

If you have any questions concerning this matter, please contact me at (202) 552-8474.

Richard Moskowitz

General Counsel

American

Fuel & Petrochemical

Manufacturers

1667 K Street NW

Suite 700

Washington, DC 20006

202.552.8474

rmoskowitz@afpm.org

Learn more about AFPM at afpm.org

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To: Michael.McAdams@hklaw.com[Michael.McAdams@hklaw.com]
From: Grundler, Christopher
Sent: Fri 11/21/2014 12:57:40 AM
Subject: Re: Rfs rumor

I will call you in the morning

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq

Original Message

From: Michael.McAdams@hklaw.com
Sent: Thursday, November 20, 2014 7:38 PM
To: Argyropoulos, Paul; Grundler, Christopher
Subject: Fw: Rfs rumor

Here is the latest.

Sent using BlackBerry

----- Original Message -----

From: Rachel Gantz [mailto:rgantz@opisnet.com]
Sent: Thursday, November 20, 2014 04:46 PM Eastern Standard Time
To: McAdams, Michael J (WAS - X75140)
Subject: Rfs rumor

That tomorrow is the today and they'll make 2014 a guidance year
Sent from my iPhone

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To: EthanolRFA@aol.com[EthanolRFA@aol.com]
From: Grundler, Christopher
Sent: Thur 11/20/2014 5:44:44 PM
Subject: Re: RVO Rumor we discussed ...

Thx. Who is this guy?

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq

Chris:

At the risk of some copyright violation, I thought you should see this. In this weird period when nothing is coming from the White House, this is the kind of rumor that begins to get legs. I just don't see how this would work though, and his description of the RVP issue is so convoluted it just doesn't make sense. But, again, I thought you should see it. Thanks for the call this morning. We'll keep in touch.

Bob

Sources: RFS Situation Still Uncertain, But More 'Options' Surfacing

By: Jim Wiesemeyer, via special agreement with Informa Economics, Inc.

November 19, 2014

Some now suggest there may be no 2014 RFS mandate established

As the extended wait continues for the final 2014 Renewable Fuels Standard (RFS) plan from EPA, sources are signaling some new developments are potentially coming for 2014 and beyond.

No RFS for 2014? Some sources are now suggesting that there may not be a final RFS level set for 2014, but instead the RFS level for the nearly finished year would be determined based on production of RINs logged into the EPA Moderated Transaction System (EMTS), the system that keeps track of RINS from producers, blenders and obligated parties.

2015 details to be set in early 2015. EPA has already signaled they will not be meeting the Nov. 30, 2014, deadline to propose the 2015 RFS standards. But contacts advise that the agency is now expected to finalize the 2015 RFS volume totals early next year and that could match closer to the approximate levels that we have been hearing for the 2014 levels, with some adjustment for carryover RINs for ethanol in particular.

Beyond 2015. Some sources are now indicating that the administration could be mulling a considerable reset of the RFS for 2016 and beyond (through 2022), with an objective of still getting corn-based ethanol to the 15 billion gallon mark that is spelled out in law that was to have been hit in 2015.

RVP issue. In addition, sources advise that USDA Secretary Vilsack has weighed in relative to the issue of Reid Vapor Pressure. Sources indicate Vilsack has been advocating increasing the RVP during the summer months of May 1 to Sept. 30.

EPA set the RVP standard at 9.0 psi for designated volatility attainment areas and the RVP standard at 7.8 psi for certain designated volatility nonattainment areas. The 9.0 psi standard applies to conventional gasoline in all other areas of the lower 48 states not covered by either the 7.8 psi federal volatility requirement or an EPA approved SIP (State Implementation Plan) fuel.

Comments: A host of possibilities now appear to be surfacing as 2014 winds down without the 2014 requirements being finalized. As recent as October, OMB Director Shaun Donovan told a *Reuters* Global Climate Change Summit that his office was still "carefully" weighing the final targets to ensure they produce the "intended results." It's not clear if that OMB review is what has produced these potential developments. In addition, the indications on the plans for 2016 and beyond may be referring to what several sources have signaled will be key for the RFS in those years – that EPA may retool the process for setting the RFS levels.

As for the RVP issue, that would be a potentially surprising issue since EPA has in recent years only adjusted the RVP from the previously established levels in nonattainment areas on an emergency basis or to address a specific event such as a hurricane or refiner outage. However, the Clean Air Act appears to give leeway for EPA to set an RVP above 9.0 which appears to be what may be at issue.

To: Patty Monahan[patty@ef.org]
Cc: Kathleen Yip[kathleen@ef.org]; Stewart, Gwen[Stewart.Gwen@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]; Charmley, William[charmley.william@epa.gov]
From: Grundler, Christopher
Sent: Wed 10/22/2014 5:16:46 PM
Subject: RE: Meeting request: Nov 12th, anytime in the afternoon

Yes. Pls work with Gwen cc'd to find a time that works for both of us. I look forward to seeing you again.

Chris

From: Patty Monahan [mailto:patty@ef.org]
Sent: Wednesday, October 22, 2014 1:14 PM
To: Grundler, Christopher
Cc: Kathleen Yip; Stewart, Gwen
Subject: Meeting request: Nov 12th, anytime in the afternoon

Chris,

Do you have time available to meet on Wednesday, Nov 12th in the afternoon? We'd like to discuss the HDV and LDV regulations, as well as fuels/the RFS.

Thanks for your consideration. Best,

Patty

Patty Monahan
Program Director, Transportation

ENERGY FOUNDATION
301 Battery St, 5th Floor
San Francisco, CA 94111
P 415.561.6700 c 510.290.8011

E patty@ef.org

www.ef.org

To: Brooke Coleman[BColeman@advancedethanol.org]
From: Grundler, Christopher
Sent: Sun 9/21/2014 5:31:31 PM
Subject: Re: NY Times Ad: Obama Own Worst Enemy on Climate?

Thanks Brooke. We'd love to get an update on when actual production will start. Still waiting

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq



Asst. Admin. McCabe,
Please see below. I know you and your team are not yet convinced that this issue is this serious, but our companies are trying to make it clear that it is. We are not comfortable attacking like this, but we are telling the truth and remain in a very difficult spot. Happy to discuss further. - brooke

----- Original message -----

From: Brooke Coleman
Date: 09/21/2014 10:44 AM (GMT-05:00)
To: Brooke Coleman
Subject: NY Times Ad: Obama Own Worst Enemy on Climate?

FOR IMMEDIATE RELEASE

Contact: Brooke Coleman, 857.719.9766

**Obama Could Be Own Worst Enemy on Climate, Warns
AEC and BIO in New Full Page *New York*
Times Advertisement**

Administration's Proposal to Fundamentally Alter Renewable Fuel Standard Will Shift Investment

Overseas

WASHINGTON, DC — A [new full page advertisement](#) in today's *New York Times* tells President Obama that if his administration accepts the EPA's proposal to fundamentally alter the Renewable Fuel Standard (RFS)—a decision the President is expected to make soon—he “will have inadvertently done more to damage [his] climate legacy than [his] worst enemies.”

The ad warns that the proposal would let oil companies off the hook for blocking competition from American renewable fuels, and prompt an exodus of investment in cellulosic ethanol—the world's cleanest motor fuel—to China and Brazil.

Running in the *New York Times* today, the message coincides with “The People's Climate March” and the beginning of Climate Week.

The EPA's ill-conceived proposal to gut the RFS comes just as the nation marks the arrival of commercial scale cellulosic ethanol production with four new facilities opening this year. In the ad, the Advanced Ethanol Council and Biotechnology Industry Organization caution President Obama that investments in additional cellulosic production beyond these four plants will likely shift overseas if the President adopts the flawed methodology of the EPA proposal, regardless of whether he decides to actually raise the renewable fuel targets in the rule.

A pdf of the ad is available [here](#). Text of the ad is below.

Headline: Is the President's worst enemy on climate ... himself?

Text:

“Dear Mr. President,

“When the federal government implemented the Renewable Fuel Standard (RFS) a little more than six years ago, America's innovators listened. Companies like Abengoa, INEOS Bio, and POET-DSM invested billions of dollars developing cellulosic biofuel — the cleanest, lowest carbon motor fuel in the world — and the first commercial plants came online earlier this year.

"But these companies now have a problem no one anticipated.

"Your Administration is proposing to change the RFS rules in the middle of the game with a brand new methodological approach that allows oil companies to avoid their obligations under the law by simply refusing to distribute renewable fuel to consumers. You will have inadvertently done more to damage your climate legacy than your worst enemies.

"To be clear, our companies are not going to fail in the mission to commercialize cellulosic biofuel. But America will fail to lead the charge if your Administration lets oil companies off the hook. And papering over the problem by increasing the RFS targets this year will not prevent the exodus of investment to China and Brazil.

"When you announced power plant rules to combat climate change earlier this summer, you said that we need builders to hammer into place the foundations for a new clean-energy era.

"We agree. And we stand ready to back you.

"But handing landmark Clean Air Act programs like the RFS over to oil companies is not going to drive investment or give low-carbon industries like ours confidence that the United States is committed to innovation and addressing climate change.


"Mr. President, your legacy requires protecting the RFS."

####

To: Shepardson, David[DShepardson@detroitnews.com]
From: Grundler, Christopher
Sent: Wed 9/17/2014 2:25:02 AM
Subject: Re: In Iowa, Biden Urged to Clarify Disturbing Reports about His Role in Renewable Fuel Backtrack

Thx. In a noisy restaurant in Chicago and missed your call, but read your story. Talk soon

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq



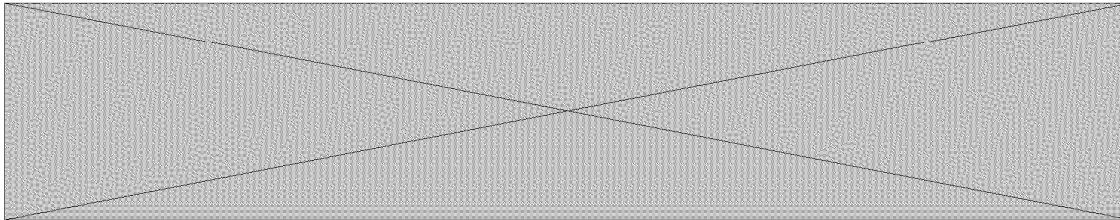
Sent from my iPhone

Begin forwarded message:

From: "T.J. Page" <tpage@iowarfa.org>
Date: September 16, 2014 at 8:12:09 PM EDT
To: Undisclosed recipients;;
Subject: In Iowa, Biden Urged to Clarify Disturbing Reports about His Role in Renewable Fuel Backtrack

*****EMBARGOED UNTIL WEDNESDAY, SEPTEMBER 17 AT
5:00 AM CST*****

Please Note: PDF version of ad is available upon request.



PRESS RELEASE

FOR RELEASE
September 17, 2014

Press Contact: T.J. Page
515-252-6249

In Iowa, Biden Urged to Clarify Disturbing Reports about His Role in Renewable Fuel Backtrack

Full Page Des Moines Register Ad: “Say It Ain’t So, Joe”

JOHNSTON, IOWA – As Vice President Joe Biden arrives in Iowa, the Iowa Renewable Fuels Association (IRFA) is taking out a full page ad in today’s *Des Moines Register* to ask the Vice President to set the record straight on reports that he may have intervened to reverse the Obama Administration’s previous support for the Renewable Fuel Standard (RFS) – and that he may have done so after receiving a call from a Pennsylvania congressman on behalf of a refinery owned by the politically connected Carlyle Group.

Biden’s office and the Vice President himself have avoided questions about the reports by [Reuters](#) and the [Philadelphia Inquirer](#), which are strikingly at odds with his otherwise strong record of support for renewable fuels, including as a Presidential candidate himself in 2007. In the wake of those reports, IRFA and almost two dozen individuals and organizations involved in Iowa’s renewable fuels industry [wrote a letter to the Vice President](#) asking him to clarify the reports and to discuss the issue with Iowans. Because he has thus far not responded, IRFA is now addressing the issue more publicly with Biden as he visits Iowa today.

The *Des Moines Register* advertisement comes just as the Obama-Biden

Administration is poised to make a final decision on whether to go forward with a plan to reduce America's renewable fuel production and allow oil companies to avoid their statutory obligation to make more low-cost, cleaner-burning renewable fuel available to consumers. The debate also comes as Iowa is emerging as the global leader in cellulosic ethanol production, with three new advanced biorefineries coming online this year.

A PDF of the *Des Moines Register* ad is attached, and the text of the ad is below:

Say it ain't so, Joe.

Mr. Vice President:

When you campaigned for President in 2007, you were one of the renewable fuels industry's greatest champions. With the Obama Biden Administration's strong support, Iowa's renewable fuel industry has doubled its output and has begun producing cellulosic ethanol -- the cleanest fuel in the world.

But in a stunning reversal late last year, the Administration proposed to gut the Renewable Fuel Standard -- cutting America's renewable fuel production and fundamentally changing the program to empower oil companies to prevent consumer access to more renewable fuel choices. According to Reuters, the change happened after a Pennsylvania congressman appealed to you directly on behalf of a Philadelphia refinery owned by the politically connected Carlyle Group.

This report, if true, is deeply troubling. We hope you'll take the opportunity today to set the record straight. And more importantly, work with us to fix the Administration's flawed proposal. It's not too late - but we need your help.

Iowa is the nation's leader in renewable fuels production. Iowa has 43 ethanol refineries capable of producing more than 3.8 billion gallons annually, including 22 million gallons of annual cellulosic ethanol production capacity and one cellulosic ethanol facility currently under construction. In addition, Iowa has 12 biodiesel

facilities with the capacity to produce nearly 315 million gallons annually.

The Iowa Renewable Fuels Association was formed in 2002 to represent the state's liquid renewable fuels industry. The trade group fosters the development and growth of the renewable fuels industry in Iowa through education, promotion, legislation and infrastructure development.


###

For more information, visit the Iowa Renewable Fuels Association website at:
www.iowaRFA.org

To: Shepardson, David[DShepardson@detroitnews.com]
From: Grundler, Christopher
Sent: Thur 9/11/2014 11:11:13 PM
Subject: Re: hey have you recovered from ND game yet

These guys are breaking my heart. Completely changed my expectations of season.
Yes, I saw the API release. Happy to chat

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq



Wanted to check in with you one of these days on a bunch of pending stuff. Not too urgent but I assume you saw RFS stuff from API today

David Shepardson
Detroit News Washington Bureau Chief
529 14th Street NW Suite 969
Washington, DC 20045
(202) 662-8735 (phone)
(202) 365-8210 (mobile)
twitter.com/davidshepardson

To: Conti, John[John.Conti@eia.gov]
Cc: Farber-DeAnda, Mindi[Mindi.Farber-DeAnda@eia.gov]; Schaal, Michael[Michael.Schaal@eia.gov]; McCabe, Janet[McCabe.Janet@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]; Machiele, Paul[machiele.paul@epa.gov]; Charmley, William[charmley.william@epa.gov]
From: Grundler, Christopher
Sent: Thur 8/14/2014 3:15:48 PM
Subject: RE: Request for Updated Information for RFS 2014

Thank you for your quick response.

Chris

From: Conti, John [mailto:John.Conti@eia.gov]
Sent: Thursday, August 14, 2014 11:14 AM
To: Grundler, Christopher
Cc: Farber-DeAnda, Mindi; Schaal, Michael; McCabe, Janet; Hengst, Benjamin; Machiele, Paul; Charmley, William
Subject: RE: Request for Updated Information for RFS 2014

Chris,

Attached is a letter updating the information EIA has previously provided for use in EPA's rulemaking to establish 2014 applicable volumes under the RFS program. A copy of the letter will be sent by U.S. mail, but I wanted to make sure that you and your colleagues had it as soon as possible. Please contact me or Michael Schaal, Director of Office of Petroleum, Natural Gas and Biofuels Analysis, if you have any questions.

John J. Conti

Assistant Administrator for Energy Analysis

U.S. Energy Information Administration

(202) 586-4430

From: Grundler, Christopher [<mailto:grundler.christopher@epa.gov>]
Sent: Tuesday, August 12, 2014 5:25 PM
To: Conti, John
Cc: Farber-DeAnda, Mindi; Schaal, Michael; McCabe, Janet; Hengst, Benjamin; Machiele, Paul; Charmley, William
Subject: RE: Request for Updated Information for RFS 2014

Excellent. Many thanks

From: Conti, John [<mailto:John.Conti@eia.gov>]
Sent: Tuesday, August 12, 2014 4:08 PM
To: Grundler, Christopher
Cc: Farber-DeAnda, Mindi; Schaal, Michael; McCabe, Janet; Hengst, Benjamin; Machiele, Paul; Charmley, William
Subject: RE: Request for Updated Information for RFS 2014

Chris,

I just wanted you to know that I have received your request and will get back to you shortly.

John J. Conti

Assistant Administrator for Energy Analysis

U.S. Energy Information Administration

From: Grundler, Christopher [<mailto:grundler.christopher@epa.gov>]

Sent: Tuesday, August 12, 2014 4:05 PM

To: Conti, John

Cc: Farber-DeAnda, Mindi; Schaal, Michael; McCabe, Janet; Hengst, Benjamin; Machiele, Paul; Charmley, William

Subject: Request for Updated Information for RFS 2014

John—

Attached is a letter requesting updated information from EIA for use in EPA's rulemaking to establish 2014 applicable volumes under the RFS program. This will be sent by mail as well, but we wanted to make sure you and your staff had it as soon as possible. Please contact me or Paul Machiele, director of my Fuels Center, if you have any questions.

Chris Grundler

Director, Office of Transportation and Air Quality

U.S. EPA

202-564-1682

To: Conti, John[John.Conti@eia.gov]
Cc: Farber-DeAnda, Mindi[Mindi.Farber-DeAnda@eia.gov]; Schaal, Michael[Michael.Schaal@eia.gov]; McCabe, Janet[McCabe.Janet@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]; Machiele, Paul[machiele.paul@epa.gov]; Charmley, William[charmley.william@epa.gov]
From: Grundler, Christopher
Sent: Tue 8/12/2014 9:24:48 PM
Subject: RE: Request for Updated Information for RFS 2014

Excellent. Many thanks

From: Conti, John [mailto:John.Conti@eia.gov]
Sent: Tuesday, August 12, 2014 4:08 PM
To: Grundler, Christopher
Cc: Farber-DeAnda, Mindi; Schaal, Michael; McCabe, Janet; Hengst, Benjamin; Machiele, Paul; Charmley, William
Subject: RE: Request for Updated Information for RFS 2014

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John J. Conti

Assistant Administrator for Energy Analysis

U.S. Energy Information Administration

From: Grundler, Christopher [mailto:grundler.christopher@epa.gov]
Sent: Tuesday, August 12, 2014 4:05 PM
To: Conti, John
Cc: Farber-DeAnda, Mindi; Schaal, Michael; McCabe, Janet; Hengst, Benjamin; Machiele, Paul; Charmley, William
Subject: Request for Updated Information for RFS 2014

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Attached is a letter requesting updated information from EIA for use in EPA's rulemaking to establish 2014 applicable volumes under the RFS program. This will be sent by mail as well, but we wanted to make sure you and your staff had it as soon as possible. Please contact me or Paul Machiele, director of my Fuels Center, if you have any questions.

Chris Grundler

Director, Office of Transportation and Air Quality

U.S. EPA

202-564-1682

To: cfdcinc@aol.com[cfdcinc@aol.com]
From: Grundler, Christopher
Sent: Tue 7/29/2014 3:46:07 AM
Subject: Re: Letter for your consideration

Doug:

My comments were in response to a question about whether EPA should engage in more consumer education about the potential for misfueling with E15, and join OPEI's campaign. I responded that given the very few stations currently selling E15, this is not a priority for us beyond what we are already doing. In my broader remarks, I tried to explain to the audience our reasoning behind our proposed standards for 2014, our commitment to implement the RFS in a way that continues the growth of biofuels while also recognizing current marketplace and other constraints, the large number of public comments, and the current status of deliberations.

Please let me know which member companies/individuals were in attendance so that I can follow up with them directly and clear up any misunderstandings. I am disappointed these folks who reported to you about my remarks did not introduce themselves to me afterwards so I could have addressed these concerns right away.

Thanks

Chris

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq

Please see attached letter regarding some questions on the RFS.

Thank you.

To: Shepardson, David[DShepardson@detroitnews.com]
From: Grundler, Christopher
Sent: Thur 7/24/2014 7:27:34 PM
Subject: RE: Sen. Franken says new RFS release is "imminent"

He tweeted this after podesta meeting?

From: Shepardson, David [mailto:DShepardson@detroitnews.com]
Sent: Thursday, July 24, 2014 3:15 PM
To: Grundler, Christopher
Subject: Sen. Franken says new RFS release is "imminent"

says biodiesel will go higher than 1.28 billion

David Shepardson

Detroit News Washington Bureau Chief

529 14th Street NW Suite 969

Washington, DC 20045

(202) 662-8735 (phone)

(202) 365-8210 (mobile)

twitter.com/davidshepardson

To: Brian Jennings[bjennings@ethanol.org]
Cc: Stewart, Gwen[Stewart.Gwen@epa.gov]
From: Grundler, Christopher
Sent: Tue 7/15/2014 2:54:41 PM
Subject: RE: ACE conference

Brian---I have a 30 minute window from 1:30 – 2, which is yours if you want it. Pls confirm with Gwen Stewart, my assistant, if this works

Chris

From: Brian Jennings [mailto:bjennings@ethanol.org]
Sent: Tuesday, July 15, 2014 9:45 AM
To: Grundler, Christopher
Subject: RE: ACE conference

Totally understand. Do you have time to meet with Ron Lamberty of ACE and I tomorrow? Early afternoon would be ideal for us, something like 1:30 or 2.

Brian

BRIAN JENNINGS

Executive Vice President

AMERICAN COALITION for ETHANOL

605-941-1314 cell

ethanol.org



@BiofuelBrian

Register now for the 27th Ethanol Conference in Minneapolis, MN, August 4-6!



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From: Grundler, Christopher [<mailto:grundler.christopher@epa.gov>]
Sent: Monday, July 14, 2014 5:37 PM
To: Brian Jennings
Subject: Re: ACE conference

Brian,

I am seeing who might be available (and that I don't need to help me with the final standard decision push)

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq

From: Brian Jennings
Sent: Saturday, July 12, 2014 5:19 PM
To: Grundler, Christopher
Subject: RE: ACE conference

Chris,

Appreciate your quick response today and your candor. Any chance one of your staff would be able to speak at our event in your stead? I think it is critical that EPA have a presence at this event given all the important ethanol issues handled by the Agency.

I'm pretty booked Tuesday, July 15 but so far fairly free on Wednesday, July 16, will give you a call.

Brian

BRIAN JENNINGS

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From: Grundler, Christopher [<mailto:grundler.christopher@epa.gov>]
Sent: Saturday, July 12, 2014 4:12 PM
To: Brian Jennings
Subject: Re: ACE conference

Brian,

I sincerely apologize. The truth is, we have kept your kind invitation in limbo for this long, as we were being optimistic that the final 2014 standards would have been published by August 4th, and saw your event as a great opportunity to talk about our final decisions. Unfortunately, it is now certain that final decisions will not have been made by then, and I will need to be in Washington shepherding the final decision-making process and unable to attend.

By the way, just because rules are still at EPA does not mean we can't meet and talk to stakeholders. However, it does mean we are necessarily limited in what we can share. Feel free to give me a call while you are in town.

Best,

Chris

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq

From: Brian Jennings

Sent: Saturday, July 12, 2014 4:51 PM

To: Grundler, Christopher

Subject: ACE conference

Chris,

Hope this finds you well. Upon returning from a few days out of the country w/ my family I heard from my staff that we've got no response thus far from your office regarding the request we sent you on May 13 to speak at our conference which takes place August 5-6.

I'll be in DC Tuesday, July 15 and Wednesday, July 16, not sure if we're able to meet with you though since the RFS rule is still at EPA, but at the very least I'd really like to hear favorably from your office on the speaking request. Anything you can do to help?

Brian

BRIAN JENNINGS

Executive Vice President

AMERICAN COALITION for ETHANOL

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 @BiofuelBrian

Register now for the 27th Ethanol Conference in Minneapolis, MN, August 4-6!

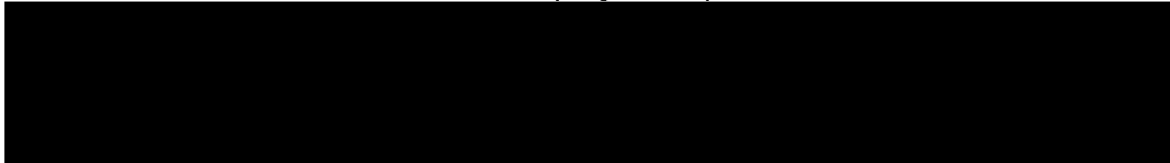


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To: Brian Jennings[bjennings@ethanol.org]
From: Grundler, Christopher
Sent: Mon 7/14/2014 10:37:10 PM
Subject: Re: ACE conference

Brian,
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Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
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Sent: Saturday, July 12, 2014 4:12 PM
To: Brian Jennings
Subject: Re: ACE conference

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Best,

Chris

Christopher Grundler, Director
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734.214.4207 (Ann Arbor)
www.epa.gov/otaq

From: Brian Jennings

Sent: Saturday, July 12, 2014 4:51 PM

To: Grundler, Christopher

Subject: ACE conference

Chris,

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Brian

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Executive Vice President

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To: Nassar, Josh[JNassar@uaw.net]
Cc: Hengst, Benjamin[Hengst.Benjamin@epa.gov]; Charmley, William[charmley.william@epa.gov]
From: Grundler, Christopher
Sent: Mon 7/7/2014 3:55:49 PM
Subject: Re: meeting request for President Dennis Williams

OK. Thanks for the heads up

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq



Chris,

I hope you are well and had a great holiday. Our new President Dennis Williams will be in DC next Monday and Tuesday and he would very much like to meet with Administrator McCarthy to introduce himself and discuss the upcoming heavy truck regs and RFS. I understand their schedulers are trying to find a time but I wanted to make sure to give you a heads up regardless.

Best regards,

Josh

Josh Nassar

The UAW

Legislative Director

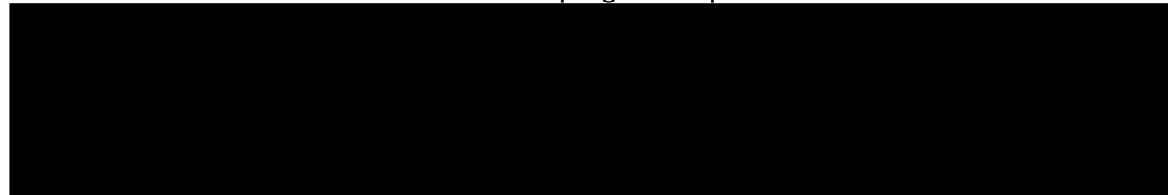
Cell-202 674-5740

Office- 202 828-1613

To: Robert Greco[Greco@api.org]
Cc: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Grundler, Christopher
Sent: Wed 6/18/2014 5:47:27 PM
Subject: Re: Letter to EPA on RFS

Thanks Bob for sharing this with us

Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
202.564.1682 (DC)
734.214.4207 (Ann Arbor)
www.epa.gov/otaq



Chris – the attached letter was sent to Gina McCarthy earlier today. We will be discussing this with the media later this morning. Bob

Bob Greco

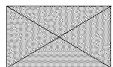
Group Director

API Downstream & Industry Operations

(202) 682-8167

greco@api.org

www.api.org



To: Corey, Richard@ARB[rcorey@arb.ca.gov]
From: Grundler, Christopher
Sent: Wed 6/11/2014 6:57:42 PM
Subject: Give me a call Re: Announcement Tomorrow

Richard--I'd like to alert you to an announcement tomorrow

Chris

202.564.5039 (DC Office Direct)
734.645.5221 (mobile)

-----Original Message-----

From: Corey, Richard@ARB [mailto:rcorey@arb.ca.gov]
Sent: Thursday, June 05, 2014 5:34 PM
To: Grundler, Christopher
Subject: RE: EPA Proposal - Need help from CARB ASAP!

Will do. Does first thing in the morning (6:00 a.m. PST) work?

Richard

-----Original Message-----

From: Grundler, Christopher [mailto:grundler.christopher@epa.gov]
Sent: Thursday, June 05, 2014 2:32 PM
To: Corey, Richard@ARB
Subject: RE: EPA Proposal - Need help from CARB ASAP!

Call me. Also, I need to talk to you about a light duty ghg matter before Monday Office Direct: 202-564-5039
Mobile: 734-645-5221

Ps: Having dinner with Cackette tonight

-----Original Message-----

From: Corey, Richard@ARB [mailto:rcorey@arb.ca.gov]
Sent: Thursday, June 05, 2014 4:52 PM
To: Grundler, Christopher
Subject: FW: EPA Proposal - Need help from CARB ASAP!

Chris:

Not for forwarding.

I am interested in your reaction to the below email.

Richard

-----Original Message-----

From: Jennifer Case [mailto:jennifer@newleafbiofuel.com]
Sent: Thursday, June 05, 2014 1:09 PM
To: Corey, Richard@ARB
Subject: EPA Proposal - Need help from CARB ASAP!

Hi Richard,

I wanted to forward you an update about what is going on in the biodiesel industry to see if there is anything CARB can do to help the situation.

The Administration is currently considering a final Renewable Fuel Standard for 2014 that would slash the demand for biodiesel in this country, with a particularly devastating effect on California. Last year, the biodiesel industry delivered approximately 2 billion gallons of biodiesel, the only commercially available EPA designated Advanced Biofuel made here in the US. Yet the EPA's proposed rule that was published late last year establishes a 1.28 billion gallon cap on biodiesel each year through the end of 2015.

Since the proposed rule came out in November, New Leaf has suffered extreme hardship. Immediately, obligated parties reduced their purchases of biodiesel resulting in an immediate drop in RIN values. Next, we were dealt another blow when the biodiesel tax incentive lapsed on December 31st. The Midwest reacted to the lack of biodiesel demand by flooding Midwestern soy biodiesel to California, hoping to capitalize on our state's low carbon fuel standard. As a result, the LCFS credits also plummeted, dealing a near fatal blow to our fledgling industry here in the state.

As you may know, California's biodiesel market has only recently began a robust expansion, thanks in part to the Low Carbon Fuel Standard and the significant investment by the California Energy Commission under AB118. The State recognizes that ultra-low carbon biodiesel is absolutely critical in order to reach the carbon reduction targets established by AB32. (Target is 1990 levels of greenhouse gas emissions by 2020).

In 2012, New Leaf received a grant under AB118 to expand our plant from 2 million gallons per year to 6 million gallons. Due to the strong state and federal policies that existed at that time, our company invested over a million dollars in new equipment, and began a two year long project to achieve our maximum production capacity. To support the new production equipment, we also significantly expanded our labor force, including recruiting 3 new managers, and added an entire shift of production operators, yard support, and invested another \$200,000 on safety improvements and technology to improve efficiencies in processing of glycerin (the co-product of biodiesel).

In December of 2013, our company reached its highest monthly production to date. A huge win for us and our industry. But sadly, by March of this year, we had suffered our third month in a row of significant revenue losses, and we had a very sad decision to make. For the first time in 9 years, we laid off employees, instituted a company-wide paycut, and REDUCED our production back down to 2 million gallons per year.

Last week, several of our best employees gave notice that they were moving on to other jobs because they couldn't afford to work at New Leaf with the pay reductions. It was a sad week, but next week will be much worse. Next week, I am laying off more than half of my staff because we are going to stop production all together. There is simply no financial benefit to turning cooking oil in to biodiesel right now, and if we don't stop making fuel, we will run out of cash by September 1st. Not only is this devastating emotionally for us and our employees, from a financial standpoint, its such a waste. In addition to the millions spent on plant expansion, we just spent \$10,000 in moving expenses to move a highly technical engineer out from South Carolina with his family. And he will be cut next week. It takes 4 months of double time to train up a plant operator, and we will be laying off 3. I've spent recruiting expenses on a chemist just 4 months ago, and he is being cut. Two of my operators are veterans from the war in Afghanistan, and they will both be laid off. And I will not be able to finish our grant with the State which may jeopardize our ability to receive grant funds in the future.

The most frustrating thing about all of this is that both the Federal and State policies have made it clear that advanced biofuels like biodiesel are a critical piece of our energy's future. We have heard rumors that the EPA may raise the overall Advanced pool under the final rule, yet leave biomass based diesel at 1.28 bil for two years. I'm not sure if CARB is aware of this, but if the EPA raises the Advanced RVO, without raising the Biomass Based Diesel pool, this will result in increased IMPORTS OF BRAZILIAN

SUGAR CANE ETHANOL TO CALIFORNIA. I know how most of Congress feels about ethanol, and I also know that the petroleum industry feels the same way, particularly as a result of reaching the so-called "blend wall". So its absolutely critical that everyone understands that the only "Advanced" biofuels commercially available are Biodiesel, Sugar Cane Ethanol and Renewable Diesel. And guess which one is the cheapest for big oil to acquire? SUGAR CANE ETHANOL FROM BRAZIL. Which just happens to qualify for California Low Carbon Fuel Standard. So when faced with a choice to buy biodiesel v ethanol, Ops will choose ethanol from Brazil over bio or RD, and that product will flood in to California at even higher rates.

New Leaf's plant is one of 6 operating plants in the State of California, and we have invested millions of dollars in to our plant (along with taxpayer's money in the form of grants). And right now, New Leaf is hanging by a thread. Yesterday, I found out that Yokayo and Blue Sky, two other bio plants in the State, have already closed its doors. Crimson, IWP and Community are likely in the same boat. All this wasted money is devastating. Why would this Administration pass such a forward thinking program like the RFS, motivating me and my family to invest all of our money in to this industry, just to pull the rug out from us? How can the State of California stand for this, when they have also relied on a strong federal policy by investing millions in to biodiesel?

Thanks in advance for anything you can do to encourage someone from CARB to talk to the EPA about this. I have to believe that if the Administration really understood the consequences of the EPA's proposal, they wouldn't let it happen.

Thanks Richard

Jennifer Case
CEO, New Leaf Biofuel
619-236-8588

-----Original Message-----

From: Corey, Richard@ARB [mailto:rcorey@arb.ca.gov]
Sent: Tuesday, February 11, 2014 9:41 PM
To: Jennifer Case
Cc: Solomon, Raquel@ARB
Subject: RE: Question

Jennifer:

By way of this email, I am checking with my assistance Raquel to see if this is a possibility. I believe I will be in SD then but may have a jammed scheduled due to border related issues on my calendar. I would be interested in making it work for the meeting with Janet/New Leaf if possible.

Richard

-----Original Message-----

From: Jennifer Case [mailto:jennifer@newleafbiofuel.com]
Sent: Tuesday, February 11, 2014 8:52 AM
To: Corey, Richard@ARB
Subject: RE: Question

Hi Richard,

The Climate Leadership Conference is taking place in San Diego February 24-26 (<http://www.climateleadershipconference.org/>). Janet McCabe, who serves as an assistant administrator at EPA under Gina McCarthy, will be speaking February 25. The Office of Transportation and Air Quality (OTAQ), which is in charge of RFS2 implementation, is managed by McCabe. So McCabe is in between McCarthy and the department directly responsible for RFS2 implementation. Is there any possibility that

your schedule would allow you to come down to San Diego to have a meeting with her and New Leaf?
Let me know!

Thanks!

Jennifer

-----Original Message-----

From: Corey, Richard@ARB [mailto:rcorey@arb.ca.gov]
Sent: Saturday, January 25, 2014 8:01 AM
To: Jennifer Case
Subject: Question

Jennifer:

Thanks again for the tour. I really appreciate the time you took. Can you send me your cell number as I have a question I wanted to ask you. I also gave your name to my staff in the alt diesel regulation that I think you can be helpful on.

Richard

Sent from my iPhone

To: Carmine.Difiglio@hq.doe.gov[Carmine.Difiglio@hq.doe.gov]
From: Grundler, Christopher
Sent: Wed 5/14/2014 9:57:14 PM
Subject: RFS Hardships (DOE Scoring)

Hi Carmine,

I hope all is well. I 'd like to chat briefly with you about the status of the RFS Hardship Interim Scoring memo that the DOE team has been drafting. This is a high priority for my office, and we are hoping that you will be able to issue it next week. I will give you a ring tomorrow or Friday.

Regards,

Chris

Christopher Grundler, Director

Office of Transportation and Air Quality

U.S. Environmental Protection Agency

202.564.1682 (Washington)

734.214.4207 (Ann Arbor)

www.epa.gov/OTAQ